

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF DELAWARE**

PAULA PAGONAKIS

Plaintiff,

V.

EXPRESS, LLC, a/k/a/
LIMITED BRANDS, INC.

Defendant.

Case No. 06-027

JURY TRIAL DEMANDED

PLAINTIFF’S SECOND MOTION TO COMPEL

Plaintiff Paula Pagonakis (“Plaintiff”), by counsel, pursuant to Rule 37 of the Federal Rules of Civil Procedure and Rule 37.1 of the Local Rules of the United States District Court for the District of Delaware, hereby moves the Court for an order (1) compelling Defendant to produce for deposition a Fed. R. Civ. P. Rule 30(b)(6) corporate designee, and (2) compelling Defendant to provide contact information for, or produce for deposition, one of its former managerial employees.

The Court is respectfully referred to the attached Memorandum of Point and Authorities in support of this Motion. A proposed order is also attached.

In compliance with Local Rule 7.1.1 counsel for Plaintiff states that they have made multiple, reasonable attempts resolve to reach agreement with the opposing attorneys on the matters set forth in the instant motion, to no avail.

Dated: March 1, 2007

Respectfully submitted,

//s/ Gary W. Aber

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* Admitted *pro hac vice*